

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Located in Alexandria**

IN RE

BIBIANA MARTHA RODRIGUEZ

Debtor

**Case No. 11-18847-RGM
Chapter 13**

OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

COMES NOW, Wells Fargo Bank, N.A., by counsel, and for its Objection to Confirmation of the Chapter 13 Plan filed by the debtor states as follows:

1. The bank is a secured creditor of the debtor pursuant to a Deed of Trust dated December 21, 2006 which secures a Mortgage Note to real property of the Debtors located at 9695 Lindenbrook Street, Fairfax, VA 22031-1132.
2. As of the date of filing, the Bank was owed approximately \$352,805.88, of which \$62,807.38 is the pre-petition arrears.
3. The Debtor's Plan proposes to pay a total of \$10,800.00 for the pre-petition arrears.
4. The Plan does not comply with 11 U.S.C. Section 1325, in that it does not pay the Movant, its pre-petition arrearage claim.

WHEREFORE, the Movant respectfully requests that Confirmation of the Chapter 13 Plan submitted by the Debtors herein be denied, and for any other relief the Court deems necessary.

Respectfully Submitted,

ROSENBERG & ASSOCIATES, LLC

/s/ Mark D. Meyer
Mark D. Meyer, #74290
7910 Woodmont Avenue, Suite 750
Bethesda, Maryland 20814
(301) 907-8000

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 29, 2012, a copy of the foregoing Objection to Plan was served via first class postage prepaid, or electronic email, to the following:

Thomas P. Gorman, Trustee
Alfred Patrick Boland, Esquire

Bibiana Martha Rodriguez
9695 Lindenbrook Street
Fairfax, VA 22031

/s/ Mark D. Meyer
Mark D. Meyer